

Exhibit D

DECLARATION

I, Micha Segeritz, am a Staff Quant UX Researcher, Privacy and Data Protection at Google.


I understand that Greg Fair, a former employee of Google, testified recently that I worked with him and Suneeti Vakharia on an “analysis of revenue impacts for users who turned off WAA,” which he described as a “series of questions and explorations” in order to attempt to “estimate” WAA’s effect on revenue at some point between 2015 and 2022.

I do not recall working on any such analysis, and am confident I did not work on any such analysis. Instead, the Google Ads Finance team worked on financial impact model of the Google Ads Personalization setting (GAP) in the Spring of 2020 on which I was advising them. I have provided the results of the modeling spreadsheets to my counsel.

I have reviewed documents cited by Plaintiffs in this action where I was copied on correspondence with Dave Monsees, Connie Choi, and others relating to a proposal to study the financial impact of users turning off WAA around the same time frame. I recall these discussions. And I recall that - to the best of my knowledge – Google never went forward with conducting that analysis and I was not involved in these analyses.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed at San Francisco, California on this 7th day of November, 2022.


Micha Segeritz